

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

NEW ENGLAND CARPENTERS HEALTH
BENEFITS FUND; PIRELLI ARMSTRONG
RETIREE MEDICAL BENEFITS TRUST;
TEAMSTERS HEALTH & WELFARE FUND
OF PHILADELPHIA AND VICINITY;
PHILADELPHIA FEDERATION OF
TEACHERS HEALTH AND WELFARE FUND;
DISTRICT COUNCIL 37, AFSCME -
HEALTH & SECURITY PLAN; JUNE SWAN;
MAUREEN COWIE and BERNARD GORTER,

Plaintiffs,

v.

FIRST DATABANK, INC., a Missouri
corporation, and McKESSON CORPORATION,
a Delaware corporation,

Defendants.

Civil Action: 1:05-CV-11148-PBS

Judge Patti B. Saris

**MCKESSON CORPORATION'S MOTION TO COMPEL
INTERROGATORY RESPONSES**

Pursuant to subsections (a)(2)(B) and (a)(3) of Federal Rule of Civil Procedure 37, for the reasons set forth in the accompanying Memorandum in Support of Defendant McKesson Corporation's Motion to Compel Interrogatory Responses, Defendant McKesson respectfully requests that the Court grant this motion to compel plaintiffs to identify their witnesses in

response to Interrogatory Nos. 1-4 and 6-7 of McKesson Corporation's First Set of Interrogatories, and to enter an Order requiring plaintiffs to do the same.

Respectfully submitted,

McKesson Corporation
By its attorneys:

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/s/ Paul Flum
Paul Flum

Dated: March 5, 2007

CERTIFICATION PURSUANT TO LOCAL RULE 37.1

I, Paul Flum, counsel of record for defendant McKesson Corporation, hereby certify that I conferred with counsel for plaintiffs in an effort to resolve the dispute referred to in this motion through a telephonic discovery conference and subsequent correspondence, and that the parties have not been able to reach agreement with respect thereto.

/s/ Paul Flum
Paul Flum

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party through the Court's electronic filing service on March 5, 2007.

/s/ Paul Flum
Paul Flum